

# EXHIBIT 69

**ERICA LAFFERTY, ET AL. V. ALEX EMRIC JONES, ET AL.**  
**David R. Jones on 05/16/2019**

1 NO. X06-UWY-CV-18-6046436S  
2 NO. X-06-UWY-CV-18-6046436S ) SUPERIOR COURT  
3 ERICA LAFFERTY, ET AL. )  
4 V. ) COMPLEX LITIGATION DOCKET  
5 ALEX EMRIC JONES, ET AL. ) AT WATERBURY  
6 MAY 6, 2019


7 NO. X-06-UWY-CV18-6046437-S ) SUPERIOR COURT  
8 WILLIAM SHERLACH ) COMPLEX LITIGATION DOCKET  
9 V. ) AT WATERBURY  
10 ALEX EMRIC JONES, ET AL. ) MAY 6, 2019

11 NO. X06-UWY-CV-18-6046438S ) SUPERIOR COURT  
12 WILLIAM SHERLACH, ET AL. ) COMPLEX LITIGATION SUPPORT  
13 V. ) AT WATERBURY  
14 ALEX EMRIC JONES, ET AL. ) MAY 6, 2019

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16 ORAL AND VIDEOTAPED DEPOSITION OF  
17 DAVID R. JONES  
18 MAY 16, 2019

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20 ORAL AND VIDEOTAPED DEPOSITION OF DAVID R. JONES, produced  
21 as a witness at the instance of the Plaintiffs, and duly sworn,  
22 was taken in the above-styled and numbered cause on the 16th day  
23 of May, 2019, from 10:31 a.m. to 11:54 a.m., before AMBER KIRTON,  
24 CSR in and for the State of Texas, reported by machine shorthand,  
25 at the offices of Ken Owen & Associates, 801 West Avenue, Austin,  
Texas.

 JONES, DAVID R - VOL 1 - 5/16/2019 1 Clips (Running 00:06:58.860)



**1. Page 04:24 to 05:06 (Running 00:00:22.849)**

04:24 Q. Good morning, Mr. Jones.  
 25 A. Good morning.  
 05:01 Q. My name is Chris Mattei. As I indicated, I represent  
 02 the families who lost loved ones at Sandy Hook as well as the  
 03 first responder who responded to Sandy Hook on the day of the  
 04 shooting. We're here to take your deposition in litigation  
 05 brought by my clients against Alex Jones, Free Speech Systems and  
 06 entities controlled by Free Speech Systems.

**2. Page 05:06 to 05:08 (Running 00:00:03.050)**

05:06 Do you understand  
 07 that?  
 08 A. Yes.

**3. Page 06:17 to 06:19 (Running 00:00:04.365)**

06:17 Q. All right. And let me ask you, you are Alex Jones's  
 18 father, correct?  
 19 A. Yes.

**4. Page 07:03 to 07:05 (Running 00:00:13.870)**

07:03 Q. When did you retire from your career as a dentist?  
 04 A. I still have a license, but I retired from active  
 05 practice in 2013.

**5. Page 08:10 to 09:09 (Running 00:01:20.826)**

08:10 Q. Okay. In 2013 did you become an employee of Free  
 11 Speech Systems?  
 12 A. I became indirectly an employee of Free Speech Systems.  
 13 Q. Okay. Why was it indirect?  
 14 A. I had a professional corporation that contracted with  
 15 large dental practice management groups and that corporation lost  
 16 its income when it lost me as an employee. And so that entity --  
 17 my professional corporation was paid lost opportunity fees and it  
 18 paid me to be an employee of Alex Jones and Free Speech Systems.  
 19 Q. Free Speech Systems paid your -- the corporation that  
 20 you controlled for lost -- lost opportunities as a result of  
 21 retiring from your dental practice and that corporation that you

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Total Number of Clips: 1

Total Number of Segments: 12

Total Running Time: 00:06:58.860

23 A. Yes.  
24 Q. -- a salary in connection with your work for Free  
25 Speech Systems?  
09:01 A. Yes.  
02 Q. Understood. Why was it arranged that way?  
03 A. For purpose of winding down incontinuity. It was  
04 probably not important but it was a reality.  
05 Q. Did there come a time when that arrangement changed and  
06 you became an on-the-books employee of Free Speech Systems?  
07 A. Yes.  
08 Q. When was that?  
09 A. I believe that was the next year.

**6. Page 10:04 to 10:08 (Running 00:00:21.680)**

10:04 describe for me from 2013 going forward what your  
05 responsibilities have been at Free Speech Systems.  
06 A. Largely just to be sure we have a good environment for  
07 our employees, that we're compliant to state and federal  
08 guidelines and that we do business properly.

**7. Page 14:15 to 15:14 (Running 00:01:14.470)**

14:15 Q. Okay. And by the way, is that true generally of the  
16 other areas of the business that you are often involved in  
17 solving problems as they arise?  
18 A. Our business is a single talent business that is driven  
19 by one party and I endeavor to take care of some of the delegated  
20 duties that it's not convenient to be done by the principal.  
21 Q. Okay. I think I understand that. The single talent  
22 you're talking about is your son, right?  
23 A. Yes.  
24 Q. Okay. Who do you report to?  
25 A. I report to Alex, if anyone.  
15:01 Q. Okay. Who else reports directly to Alex?  
02 A. Everyone. All the key personalities in -- in the  
03 business.  
04 Q. Okay. But -- so that's not everyone because there are  
05 how many employees at Free Speech Systems?  
06 A. I think 70.  
07 Q. Okay. So not all 70 employees have a direct reporting

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Total Number of Clips: 1

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09 A. The majority of them do.

10 Q. The majority of them do, okay. Who do you consider to

11 be the corporate leadership at Free Speech Systems?

12 A. Alex Jones.

13 Q. Nobody else?

14 A. Nobody else.

**8. Page 30:05 to 31:02 (Running 00:01:15.810)**

30:05 Q. Right. So I want to just focus on business and

06 marketing plans. You attested, am I correct, that information

07 regarding the business and marketing plans of Free Speech Systems

08 was confidential and proprietary, correct?

09 A. That seems reasonable to me.

10 Q. And highly valuable to Free Speech Systems, correct?

11 A. Well, if you don't know how to do business you can't do

12 business.

13 Q. So correct?

14 A. So yes.

15 Q. Okay. So tell me what the business plan or plans were

16 that you were referring to as confidential, proprietary and

17 highly valuable?

18 A. Essentially our core philosophy is what was involved

19 and I don't know that I really should have been concerned because

20 it's probably not articulated in paper in any place. But in

21 reality it has to do with the fact that our customers are so

22 loyal to us that they believe in what we're doing to such a

23 degree that if we say something is good for you and is a good

24 value they're going to buy it and buy a lot of it. And -- and,

25 you know, you don't really -- it's hard to articulate that, but

31:01 the core of the heart of things can sometimes be very simple and

02 very valuable.

**9. Page 35:21 to 36:01 (Running 00:00:29.070)**

35:21 Q. Okay. Are you aware whether Free Speech Systems

22 collects data concerning when during an Alex Jones broadcast it

23 has the most sales activity?

24 A. Only in the sense that if there have been days where we

25 had extraordinarily good sales someone will say what was Alex

36:01 saying when that happened and so we like to emulate spikes. So

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Total Number of Clips: 1

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36:09 Q. I see, okay. And on those occasions where there have  
10 been spikes in sales, as you said, that's something that Free  
11 Speech Systems would reasonably try to emulate?  
12 A. Yes.

**11. Page 37:22 to 38:03 (Running 00:00:28.770)**

37:22 Q. Understood. Understood. Just going back a moment to  
23 those times where sales spikes or revenue spikes and correlating  
24 that to whatever was happening on the air. Who would be most  
25 knowledgeable within the organization about -- about those sales  
38:01 trends that you described from 2012 to today?  
02 A. Alex Jones.  
03 Q. Alex would be, okay.

**12. Page 38:12 to 38:22 (Running 00:00:50.970)**

38:12 Q. What precisely have you observed in that regard?  
13 A. I've observed, for example, if people are being  
14 stressed out about the idea of there being very dangerous flu  
15 things out there and stuff and we have found that there is a  
16 product that is licensed by the FDA to be a good surface  
17 disinfectant and actually you can make claims along those lines.  
18 If there is a headline that the Disease Control of Atlanta is  
19 saying that flu is up five times and we say we have something  
20 that we believe will support your immune system and I personally  
21 use it as a hand sanitizer, you know, that kind of puffery sells  
22 well.

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15 REPORTER'S CERTIFICATION  
 16 VIDEOTAPED DEPOSITION OF  
 DAVID R. JONES  
 17 MAY 16, 2019

18 I, AMBER KIRTON, Certified Shorthand Reporter in and for the  
 19 State of Texas, hereby certify to the following:

20 That the witness, DAVID R. JONES, was duly sworn by the  
 21 officer and that the transcript of the oral deposition is a true  
 22 record of the testimony given by the witness:

23 That the deposition transcript was submitted on  
 24 May 21, 2019, to the witness or to the attorney for

25

**ERICA LAFFERTY, ET AL. V. ALEX EMRIC JONES, ET AL.**  
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1 Defendants for examination, signature and return to Huseby Global  
2 Litigation by June 10, 2019;

3 That the amount of time used by each party at the deposition  
4 is as follows:

5 Mr. Christopher M. Mattei - 01 hour(s): 09 minute(s)  
Mr. Norman Pattis - 00 hour(s): 00 minute(s)  
6 Ms. Kristen A. Jakiela - 00 hour(s): 00 minute(s)  
Ms. Claire Pariano - 00 hour(s): 00 minute(s)  
7

8 That pursuant to information given to the deposition officer  
9 at the time said testimony was taken, the following includes all  
10 parties of record:

11 Mr. Norman Pattis & Ms. Alinor C. Sterling, Attorneys for  
Plaintiffs  
12 Mr. Norman Pattis, Esq, Attorney for Alex Emric Jones,  
InfoWars, LLC, Free Speech Systems, LLC, InfoWars Health, LLC and  
13 Prison Planet TV, LLC  
Ms. Kristen A. Jakiela, Attorney for Cory T. Sklanka  
14 Ms. Claire Pariano, Attorney for Midas Resources, Inc.

15 I further certify that I am neither counsel for, related to,  
16 nor employed by any of the parties or attorney in the action in  
17 which this proceeding was taken, and further that I am not  
18 financially or otherwise interested in the outcome of the action.

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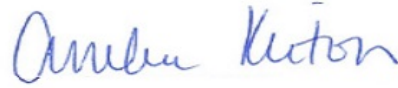


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1 Certified to by me this 21st day of May, 2019.

2



3

Amber Kirton, CSR

4

Expiration Date: 12/31/19

5

Firm #660

Huseby Global Litigation

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